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March 4, 2014

Honorable Judge William D. Wall
Magistrate Judge, Eastern District of New York
100 Federal Plaza, Courtroom 820
Central Islip, New York 11722-9014

Via ECF & FedEx Overnight

Re: 7-Eleven, Inc. v. Farrukh Baig, et al.
2:13-CV-06354-SJF-WDW

Dear Judge Wall,

I represent the Defendants BUSHRA BAIG, FARRUKH BAIG and ABY'S ENTERPRISES, LTD. in this action. I am respectfully requesting the extension time to file an Answer in the above captioned matter by an additional sixty (60) days to May 5, 2014.

One previous request for an extension of time was made by joint application of the parties for a period of ninety (90) days which was granted, which time expires on or around March 5, 2014.

The request is made because the primary defendant FARRUKH BAIG is currently incarcerated pursuant to a Federal Indictment arising from related claims herein.

The outcome of the civil matter is heavily contingent on the resolution of the criminal matter. Major portions of the civil matter may be resolved via the determination of issues made in the criminal matter. An injunction appointing a receiver of the subject 7-Eleven stores has already been entered in this action. I have only recently been retained to represent Defendants FARRUKH BAIG and ABY'S ENTERPRISES, LTD.

The extension for the defendants' answer is made for good cause as the civil litigation will be affected by the outcome of the criminal cases and prosecuting the civil action prior to that determination may impair the constitutional rights of BASHRA BAIG and FARRUKH BAIG.

I have communicated with the Plaintiff's attorney, Susan Metcalfe, and she consents to this request.

I respectfully request that the within request be granted by the Court, or that such other or further relief as this Court deems just and proper be granted.

I respectfully request that this proposed request be approved by your Honor.

I thank the Court for your attention to this matter.

Sincerely,

John Tumelty
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